



# DISTRICT COURT OF MARYLAND FOR Washington County

Located at 36 West Antietam St, Hagerstown, Maryland 21740

Case No. D-112-CR-23-003832

STATE OF MARYLAND

VS.

FERGUSON, JORDAN D.

20737 EMERALD DRIVE

HAGERSTOWN, MD 21742-0000

## COMMENTS:

Related Case No. D-112-CR-23-003833

CC#:

SID:

FBI#:

LID:

DL#:

Race: B Sex: M

Ht: 5' 08"

Wt: 175

Hair:

Eyes:

DOB: 07/25/1990

Home phone: 240-500-5031

Cellphone:

Charge | Statute | Arrest

CON-STALKING | CL |

Charge | Statute | Arrest

STALKING | CR 3 802 (c) |

## CRIMINAL SUMMONS ON CHARGING DOCUMENT

STATE OF MARYLAND, Washington County, to wit:

### To the defendant:

YOU ARE SUMMONED AND COMMANDED to appear for a Trial/Hearing on a date to be set by the Clerk to answer the charge(s) lodged against you in the charging document attached hereto.

**NOTICE TO DEFENDANT:** If you fail to appear at the place, time and date set forth above, a warrant for your arrest may be issued. If you change your name, address, or telephone number, you must notify the court at the above location prior to the hearing/trial date. To request a foreign language interpreter or a reasonable accommodation under the Americans with Disabilities Act, please contact the court immediately. **TTY users call Maryland RELAY: 711.** Possession and use of cell phones and other electronic devices may be limited or prohibited in designated areas of the court facility.

Date: 08/31/2023

Judge/Commissioner/Clerk:

C. Titus

ID: B046

Given to: WASHINGTON COUNTY SHERIFF'S DEPT

**NOTICE TO OFFICER:** If not served by 10/01/2023, return to the Court.

## ACKNOWLEDGEMENT

I acknowledge receipt of a copy of this Summons and Charging Document and hereby promise to appear in the District Court as directed by the Summons. I understand that acceptance of this Summons is not an admission of guilt but that my failure to appear at the place, time and date herein set forth will result in the issuance of a warrant for my arrest.

Date: \_\_\_\_\_

Signature of Defendant: \_\_\_\_\_

## RETURN OF SERVICE

☐ I certify that I delivered a copy of this Summons and Charging Document to the defendant personally at

\_\_\_\_\_ o'clock \_\_\_\_ M. on \_\_\_\_\_ at \_\_\_\_\_  
Date Place

☐ I certify that the defendant could not be found.

☐ I certify that I personally attempted to deliver a copy of this Summons and Charging Document to the defendant, but they refused to accept and/or sign a receipt for the document(s).

Signature of Issuing Officer

Officer's Title

Printed Name of Officer

Date

Agency, Sub Agency, I.D.



# DISTRICT COURT OF MARYLAND FOR Washington County

Located at 36 West Antietam St, Hagerstown, Maryland 21740



Case No. D-112-CR-23-003832

**STATE OF MARYLAND**

**VS.**

**FERGUSON, JORDAN D.**

**COMPLAINANT:**

DISCAVAGE, JOHN R.  
22 YANKEE DRIVE  
KEEDYSVILLE, MD 21756

20737 EMERALD DRIVE  
HAGERSTOWN, MD 21742

CC#:

LID:

Race: B Sex: M

DOB: 07/25/1990

SID:

DL#:

Ht: 5' 8"

Wt: 175

Home phone: 240-500-5031

FBI#:

Hair: Eyes:

Cellphone:

## STATEMENT OF CHARGES

UPON THE FACTS CONTAINED IN THE APPLICATION OF DISCAVAGE, JOHN R. IT IS FORMALLY CHARGED THAT FERGUSON, JORDAN D. at the dates, times and locations specified below:

NUM	CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
001	1 6525	CR 3 802 ((c))	5 Y &/or \$5,000.00	STALKING On or About 10/07/2022 - 11/30/2022 HAGERSTOWN WASHINGTON COUNTY, MARYLAND ...did engage in stalking John R. Discavage. Against the Peace, Government, and Dignity of the State.
002	1C6525	CL	5 Y &/or \$5,000.00	CON-STALKING On or About 10/07/2022 - 11/30/2022 HAGERSTOWN WASHINGTON COUNTY, MARYLAND ...did conspire with Christina Patterson to engage in stalking John R. Discavage. Against the Peace, Government, and Dignity of the State.

Date : 08/31/2023 Time : 2:43 PM

Tracking No. 231001427171

Judicial Officer: C. Titus B046



## DISTRICT COURT OF MARYLAND FOR Washington County

LOCATED AT (COURT ADDRESS)  
36 W. Antietam Street, Hagerstown, MD 21740DISTRICT  
CASE

D-112-CR-23-003832



## COMPLAINANT

## DEFENDANT

John R. Discavage

Printed Name

22 Yankee Drive

Address

Keedysville, MD 21756

City, State, Zip

240-498-4485

Telephone

Agency, Sub-agency, and I.D. #

(Officer Only)

Jordan D. Ferguson

Printed Name

20737 Emerald Drive

Address

Hagerstown, MD 217421

City, State, Zip

240-500-5031

Telephone

CC#

DEFENDANT'S DESCRIPTION: Driver's License # \_\_\_\_\_ Sex M Race B Ht 5'8" Wt 175Hair \_\_\_\_\_ Eyes \_\_\_\_\_ Complexion \_\_\_\_\_ Other \_\_\_\_\_ DOB 07/25/1990 ID \_\_\_\_\_

## APPLICATION FOR STATEMENT OF CHARGES

Page 1 of \_\_\_\_\_

(Include a statement of facts within your personal knowledge (what you saw or heard, what someone said to you, etc.) showing that there is probable cause to believe that a crime has been committed and that the defendant has committed it. Please see the "NOTICE TO APPLICANT FOR A CHARGING DOCUMENT" for further information.)

I, the undersigned, apply for a statement of charges and a summons or warrant which may lead to the arrest of the above named defendant because on or about October 7, 2022 at 10 Campus Ave., Boonsboro, MD 21713, and continuing through November 2022, all in Hagerstown, MD, the above named defendant planned, coordinated, and conspired, together with Christina Patterson (co-defendant), to place a "CUBE" GPS tracker

on my vehicle in order to remotely monitor and track my location without my permission, knowledge, or consent. While we were attending a night football game and half-time band performance for my daughter, Patterson intentionally created a scene/conflict with me to distract my attention while Ferguson placed the tracker on my vehicle in the parking lot.

(Continued on attached \_\_\_\_\_ pages) (DC-CR-001A)

I solemnly affirm under the penalties of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

Date

Officer's Signature

I have read or had read to me and I understand the notice on the back of this form.

Printed Name

Date

Applicant's Signature

Printed Name

Subscribed and sworn to before me 08/31/2023 at 10:35 AM ☐ PM

Date

Time

Judge/Commissioner

C. D. B. B. 46

ID Number

I understand that a charging document will be issued and that I must appear for trial ☐ on \_\_\_\_\_ at \_\_\_\_\_, ☐ when notified by the clerk, at the court location shown at the top of this form.

Time

Date

Applicant's Signature

☐ The applicant requests reasonable protection for safety of the alleged victim or the victim's family:

☒ I have advised applicant of the right to request shielding.

☒ The applicant declines shielding.

☐ I declined to issue a charging document because of lack of probable cause.

Date

Commissioner

ID Number



## NOTICE TO APPLICANT FOR A CHARGING DOCUMENT

You are applying for a charging document which may lead to the arrest and detention of the person you are charging. If the commissioner issues a charging document, neither you nor the commissioner may withdraw the charges later. The charge may only be disposed of by trial or by action of the State's Attorney.

You must appear at the trial as a witness. Unless you are excused by the State's Attorney, failure to appear on the date set by the court could result in your arrest for failure to obey a court order.

You are filing the application under oath. Criminal Law Article § 9-503, of the Annotated Code of Maryland makes it a crime to knowingly make a false statement in order to have charges brought or an official investigation started.

Please give as much information as possible about the offense. This form should enable the judicial officer who reads it to come to conclusions about what has happened. You should explain what you know about what has happened, and how you know it. Your application should clearly state the following:

1. **WHO?**  
Identify the accused, (the person about whom you are complaining), and identify yourself. Explain how you know that the accused is the person who did what you are complaining about.
2. **WHEN?**  
State the time, day, month and year of the offense.
3. **WHERE?**  
State the exact address and street, the city, county and state where the offense happened. Also state whether the offense happened in a private home or in some public place.
4. **WHAT?**  
State exactly what was done, and to whom it was done. For example, if property was taken, describe it and its value; or, if property was damaged or destroyed, indicate the original cost of the item or its replacement value. If you do not know the exact value, estimate it as accurately as possible.
5. **WHY?**  
The intent and motivation of the accused are important. State any information which relates to these questions.
6. **HOW?**  
Explain how the accused committed the offense. For example, if you were physically assaulted, were you struck with a fist, a flat hand, kicked, or pushed, or were you struck with an object, such as a club or pipe, etc.? If property was taken, how did the accused get it? If it was destroyed or damaged, how did the accused cause the damage?
7. At the top of the application, you will notice a space marked "DEFENDANT'S DESCRIPTION." The information in this space refers to the **accused**. Please furnish as much information as possible so that the accused may be easily identified.

If you need assistance in completing your application, please ask the commissioner.

You may request that the address and telephone number of a victim, complainant, or witness be considered for shielding at the time you file this application.

**NOTICE: Remote access to the name, address, telephone number, date of birth, e-mail address, and place of employment of a victim or non-party witness is blocked. (Md. Rule 16-918)**

**DISTRICT COURT OF MARYLAND FOR** Washington County

LOCATED AT (COURT ADDRESS)

36 W. Antietam Street, Hagerstown, MD 21740

DC Case : D-112-CR-23-003832

(City/County)



DEFENDANT'S NAME (LAST, FIRST, M.I.)

FERGUSON, Jordan D.

**APPLICATION FOR STATEMENT OF CHARGES (CONTINUED)** Page \_\_\_\_ of \_\_\_\_

I did not take any action sooner, because I did not have any information on who placed the tracker on my vehicle or how it was placed there until late spring/summer 2023.

In November 2022, I began to question how my location seemed known to others before any direct communication with me regarding the same. On November 23, 2022, a search of my Jeep Grand Cherokee was performed. Found hidden up and tucked out of plain sight underneath the passenger side metal frame of the vehicle, I located a black/silver "CUBE" GPS tracker with a purple hair-tie type fastener used to keep it in place. I removed the tracker from the vehicle, immediately took a photo of the tracker, and stored it. I had no information at that time about who was responsible for hiding it there or when it had been placed there.

On or about April 21, 2023, in text messages, Patterson admitted that she purchased the GPS tracker and that her and her boyfriend, Ferguson, coordinated to place it on my vehicle. They later referenced the tracker in subsequent conversations as if were a joke for them, so I wanted to confirm their statements and information before taking action. In June 2023, in a conversation at Patterson's residence, both stated that they placed the tracker on my vehicle to pinpoint and remotely monitor my location from a computer at their residence in Hagerstown, Maryland. They continued to joke that they were "bored" because it did not provide them with any useful information to use against me or publish to others.

It was not until on or about August 2023, very recently, that I was able to confirm and corroborate their statements, version of events, and admissions with another friend that they confided in earlier in the year. I also learned additional information that they would track and share my location with others through a specifically created google account under the name "namelessnerds411@gmail.com." With the additional information in the last few weeks, there was enough to move forward. By using a GPS tracking device to track/pinpoint and broadcast my location without my knowledge or consent, they intentionally caused great emotional distress and relationship issues for myself and my children. They used this tracker to share my location with others and to continue to create and promulgate false information to cause conflicts with my children, attempt to alienate them in violation of our custody Court Order, and to intervene in my personal relationships. The placement of this device was planned, coordinated, and done with the intent and purpose of stalking to cause conflict, inflict distress, anxiety, and harm. The Defendant and Co-Defendant committed these acts without any court order to do so, lawful purpose, or authorization under any local, State, or federal law.

I am requesting that FERGUSON be charged with the following:

CR 3-802 Stalking

CL Conspiracy to Commit Stalking

All events occurred in Hagerstown, Maryland.

*MR. FERGUSON IS MS PATTERSON'S  
BOYFRIEND AT THE TIME &  
ROOMMATE. JAD -  
MS. PATTERSON IS MY EXWIFE  
& WE WERE DIVORCED IN 2014.*

08/31/2023

Date

Applicant's Signature

JOHN R. DISCAVAGE

Printed Name

Tr.#231001427171



**NOTICE OF ADVICE OF RIGHT TO COUNSEL FOR ALL JUDICIAL PROCEEDINGS  
TO THE PERSON CHARGED:**

1. This paper charges you with committing a crime.
2. If you have been arrested and remain in custody, you have the right to have a judicial officer decide whether you should be released from jail until your trial.
3. If you have been served with a citation or summons directing you to appear before a judicial officer for a preliminary inquiry at a date and time designated or within five days of service if no time is designated, a judicial officer will advise you of your rights, the charges against you, and penalties. The preliminary inquiry will be cancelled if a lawyer has entered an appearance to represent you.
4. You have the right to have a lawyer.
5. A lawyer can be helpful to you by:
  - (A) explaining the charges in this paper;
  - (B) telling you the possible penalties;
  - (C) explaining any potential collateral consequences of a conviction, including immigration consequences;
  - (D) helping you at trial;
  - (E) helping you protect your constitutional rights; and
  - (F) helping you to get a fair penalty if convicted.
6. Even if you plan to plead guilty, a lawyer can be helpful.
7. If you are eligible, the Public Defender or a court-appointed attorney will represent you at any initial appearance before a judicial officer and at any proceeding under Rule 4-216.2 to review an order of a District Court commissioner regarding pretrial release. If you want a lawyer for any further proceeding, including trial, but do not have the money to hire one, the Public Defender may provide a lawyer for you. To apply for Public Defender representation, contact a District Court commissioner.
8. If you want a lawyer but you cannot get one and the Public Defender will not provide one for you, contact the court clerk as soon as possible.
9. **DO NOT WAIT UNTIL THE DATE OF YOUR TRIAL TO GET A LAWYER.** If you do not have a lawyer before the trial date, you may have to go to trial without one.

Contact information for District Court Commissioner's Offices can be found at:

<http://www.mdcourts.gov/district/directories/commissionermap.html>

If you require further information about qualifying for a Public Defender, call 1-833-453-9799.

**NOTICE TO DEFENDANT**

1. **MUST APPEAR** - If the offense with which you are charged is a 'MUST APPEAR' offense, you may not waive trial but are required to appear in court when notified. Drivers who receive payable citations included with a "Must Appear" citation automatically will receive a trial date notice for all citations. PLEASE NOTE THAT FAILURE TO APPEAR MAY RESULT IN A WARRANT FOR YOUR ARREST.
2. **PRESET FINE** - If ALL of your charges are marked "Payable", you must comply with one of the following within 30 days after receipt of the citation/summons.
  - OPTION #1** - Pay the full amount of the preset fine for each violation.
  - OPTION #2** - Request a waiver hearing regarding sentencing and disposition instead of trial - Plead Guilty With an Explanation: Do not send payment.
  - OPTION #3** - Request a trial date, time, and place established by the District Court of Maryland by writ or trial notice. Do not send payment.

Please note that payment of the preset fine will result in conviction for the offense(s) charged being entered against you and the case being closed. Please note further that points will be assessed by MVA on your driving record after conviction of a violation of the Motor Vehicle Laws of this State. Failure to pay the preset fine or to appear at trial, after notice, will result in the suspension of your driving privileges by the Motor Vehicle Administration.

**FOR MORE INFORMATION AND TO PAY CITATIONS:**

Visit the MD Judiciary Website at [www.mdcourts.gov/district](http://www.mdcourts.gov/district) or call the Interactive Voice Response (IVR) System for trial dates, court locations, and directions.

**From all areas including out-of-state calls: 1-800-492-2656  
TTY users call Maryland RELAY: 711**

I have read or have had read to me the contents of the above notice and acknowledge receipt of a copy thereof.

Date

Defendant

Date

Judge/Commissioner

**IMPORTANT NOTICE**

The attached papers charge you with committing a crime. Depending on the crime charged, a **jail sentence** could be imposed by the court if you are found guilty. You have a right to be represented at trial by a lawyer. **ACT IMMEDIATELY** to obtain a lawyer. If you cannot afford a lawyer, you may apply for the Public Defender through the **District Court Commissioner** who will determine if you are eligible for the Public Defender to represent you at trial. If you wait too long to retain the Public Defender or private counsel you can be made to stand trial without a lawyer. Applications are accepted at any District Court Commissioner's Office during operating hours. Please contact the office listed below for operating hours:

**District Court Commissioner Station for** Washington County  
36 WEST ANTIETAM ST  
Hagerstown, MD 21740  
1-833-453-9799

You should bring the following papers to apply for the Public Defender's services:

1. Court charging documents/traffic tickets. (Statement of Charges/all documents issued to you by court).
2. Trial date notices from the court. (You may apply even if no trial date has been received.)
3. If you are employed:  
Written proof of salary, pay stubs, or other written verification of income for the last two pay periods.
4. If you are unemployed:  
Proof of public assistance, medical assistance, Social Security or Supplemental Security Income (SSI), or other assistance you are receiving.

For more information on operating hours or locations visit the Maryland Judiciary website:  
[mdcourts.gov/district/directories/commissionermap](http://mdcourts.gov/district/directories/commissionermap)  
If you require further information about qualifying for the Public Defender, call 1-833-453-9799.

**IMPORTANT**

IF THE COMMISSIONER DETERMINES THAT YOU ARE ELIGIBLE TO BE REPRESENTED BY THE PUBLIC DEFENDER AT TRIAL, YOU WILL RECEIVE A **FINAL QUALIFICATION** IN WRITING. ONCE YOU HAVE RECEIVED THE FINAL QUALIFICATION, ALL QUESTIONS SHOULD BE DIRECTED TO THE PUBLIC DEFENDER'S OFFICE:

The address of the Public Defender is:

**81 W. WASHINGTON ST., SUITE A  
HAGERSTOWN, MARYLAND 21740**

Their telephone number is: **301-791-4735**

The Office of the Public Defender is open weekdays from 8:30 a.m. to 4:30 p.m.

I have read, or have had read to me, the contents of the above notice and acknowledge receipt of a copy thereof.

DATE

SIGNATURE OF DEFENDANT

**IF YOU DO NOT HAVE A LAWYER ON THE TRIAL DATE, YOU MAY  
HAVE TO GO TO TRIAL WITHOUT THE ASSISTANCE OF A LAWYER.**

Tr.#231001427171